

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO. 2:21-MJ-670
	:	
vs.	:	MAGISTRATE JUDGE VASCURA
	:	
BRANDON WILLIAM TVEDT,	:	
	:	
Defendant.	:	

MOTION TO TEMPORARILY MODIFY CONDITIONS OF RELEASE

Defendant Brandon William Tvedt, through undersigned counsel, hereby moves this Court for an Order temporarily modifying his conditions of release.

Respectfully submitted,

/s/ Steven S. Nolder

Steven S. Nolder (0037795)
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Columbus, Ohio 43215
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Attorney for Brandon William Tvedt

MEMORANDUM

On October 13, 2021, a criminal complaint was filed charging Brandon William Tvedt with possession with intent to distribute a controlled substance as well as conspiring to commit this substantive offense. (R. #1, Complaint). On November 30, 2021, Tvedt was arrested in the Southern District of Texas and released on conditions of release two days later. (R. #3, Order Setting Conditions of Release, Page ID #85).

The conditions of release are standard including reporting to Pretrial Services in Houston as well as a travel restriction permitting Brandon William Tvedt to leave the Southern District of

Texas to travel to the Southern District of Ohio as well as the neighboring counties contiguous to Houston.

On December 29, 2021, William Sanford McDonald, Brandon William Tvedt 's family friend, passed away in Fort Worth, Texas and his memorial service is scheduled for January 20, 2022, at 2:00 p.m. at the Christ Chapel Bible Church in Fort Worth. (Exhibit A). Because of his long-time friendship with Mr. McDonald, Tvedt would like to attend this service. However, because Fort Worth is in a county that's not contiguous to Houston and is in the Northern District of Texas, he herein seeks a temporary modification to his conditions of supervision permitting him to attend.

If permitted to attend, Tvedt would travel with his mother, by car, from Houston to Ft. Worth, on January 19, 2022. Tvedt and his mother would overnight in the Ft. Worth area. This overnight trip is necessary because it's a four-hour one-way trip from Houston to Ft. Worth. Shortly after the memorial service is completed, Tvedt and his mother would return to Houston.

Undersigned counsel has spoken with, Brittney Bailey (832) 588-4431, Tvedt's Pretrial Services Officer, and she doesn't object to this temporary modification. Additionally, undersigned counsel has spoken with AUSA Michael Hunter, who also does not object to this temporary modification.

Brandon William Tvedt, through undersigned counsel, hereby moves this Court for an order temporarily modifying his conditions of release allowing him to travel to Ft. Worth on January 19, 2022, stay overnight, attend Mr. McDonald's memorial service, and return to Houston on January 20, 2022.

Respectfully submitted,

/s/ Steven S. Nolder
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document has been electronically served on AUSA Michael Hunter this 12th day of January, 2022.

/s/ Steven S. Nolder
Steven S. Nolder (0037795)
Attorney for Brandon William Tvedt